

CR 07 00501

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

1C
JF

THE UNITED STATES OF AMERICA

vs.

RAHMAT ABDHIR and
ZULKIFLI ABDHIR

INDICTMENT

Counts One and Two: Title 18, United States Code, Section 2339A – Conspiracy to Provide/Providing Material Support to Terrorists.

Counts Three through Fifteen: Title 50, United States Code, Section 1705 – Contributing Goods and Services to a Specially Designated Global Terrorist.

Count Sixteen: Title 18, United States Code, Section 1001 – Material False Statements

A true bill.


Foreperson

Filed in open court this 1 **day of** Aug 2007

A.D. 2005


UNITED STATES MAGISTRATE JUDGE

Bail. \$ _____

NO BAIL WARRANT
RS

SCOTT N. SCHOOLS (SC 9990)
United States Attorney

SEALED BY ORDER
OF COURT

FILED
AUG 1 - 2007
RICHARD L. BREKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CR 07 00501JF

RS

UNDER SEAL

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAHMAT ABDHIR,

a/k/a Sean Kasem,
a/k/a Sean Kalimin,
a/k/a Roy Kalimin,
a/k/a Salam A. Jabar, and

ZULKIFLI ABDHIR,

a/k/a Zulkifli Bin Abdul Hir,
a/k/a Hulagu,
a/k/a Holagu,
a/k/a Lagu,
a/k/a Marwan,
a/k/a Kulon
a/k/a Musa Abdul,
a/k/a Musa Abdul Hir,
a/k/a Zulkifli Abdul Hir,
a/k/a Zulkifli bin Hir,
a/k/a Abdul Hir bin Zulkifli,
a/k/a Abdulhir Bin Hir,
a/k/a Bin Abdul Hir Zulkifli,

Defendants.

No.

Count 1: 18 U.S.C. § 2339A – Conspiracy
to Provide Material Support to Terrorists;

Count 2: 18 U.S.C. § 2339A – Provide
Material Support to Terrorists;

Counts 3 - 15: 50 U.S.C. § 1705(b) –
Contributing Goods and Services to a
Specially Designated Global Terrorist;

Count 16: 18 U.S.C. § 1001 – False
Statements

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges:

INDICTMENT

General Allegations

At all times relevant to this Indictment:

1. Defendant Rahmat Abdhir, a/k/a "Sean Kasem," "Sean Kalimin," "Roy Kalimin," "Salam A. Jabar" (hereafter "Rahmat Abdhir") is a U.S. citizen living in the Northern District of California, and the brother of Zulkifli Abdhir.

2. Defendant Zulkifli Abdhir, a/k/a "Zulkifli Bin Abdul Hir," "Hulagu," "Holagu," "Lagu," "Marwan," "Kulon," "Musa Abdul," "Musa Abdul Hir," "Zulkifli Abdul Hir," "Zulkifli bin Hir," "Abdul Hir bin Zulkifli," "Abdulhir Bin Hir," "Bin Abdul Hir Zulkifli," (hereafter "Zulkifli Abdhir" or "Zulkifli Bin Abdul Hir") is a Malaysian citizen and a wanted fugitive currently believed to be living in the Philippines, and the brother of Rahmat Abdhir.

3. Minah binti Aogis Abd Aziz, a/k/a "Mak," is a Malaysian citizen and the mother of eleven children, including Rahmat Abdhir and Zulkifli Abdhir.

4. Under the International Emergency Economic Powers Act, 50 U.S.C. §§ 1701-1706 ("IEEPA"), upon the declaration of a national emergency with respect to "any unusual and extraordinary threat . . . to the national security, foreign policy or economy of the United States," the President of the United States ("the President") has the authority to "investigate, regulate, or prohibit" transactions involving "any property in which any foreign country or a national thereof has any interest by any person, or with respect to any property, subject to the jurisdiction of the United States" 50 U.S.C. §§ 1701-1702.

5. On September 23, 2001, pursuant to IEEPA, the President issued Executive Order 13224, entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism." In this Executive Order, the President declared a national emergency to address "the terrorist attacks in New York, Pennsylvania, and the Pentagon committed on September 11, 2001" and "the continuing and immediate threat of further attacks on United States nationals or the United States. . . ." The President further found that it was necessary "because of the pervasiveness and expansiveness of the financial foundation of foreign terrorists" to impose financial sanctions against "foreign persons that support or otherwise associate with these foreign terrorists."

6. Executive Order 13224, among other things, prohibits any transaction or dealing by United States persons in property or any interest in property of organizations or individuals named in the Annex to the Order or declared to be a Specially Designated Global Terrorist by the U.S. Secretary of State or the Secretary of Treasury pursuant to the criteria articulated in the Order. The Executive Order also blocks, or freezes, any interest in property held by any organization or person determined to be subject to the Order.

7. In addition, Executive Order 13224 specifically prohibits: (1) any transaction to include "the making or receiving of any contribution of funds, goods or services to or for the benefit of those persons. . . subject to this order. . . ; and (2) any conspiracy formed to violate any of the prohibitions set forth in this order"

8. On September 5, 2003, pursuant to Executive Order 13224, the United States government designated Zulkifli Bin Abdul Hir (a/k/a "Musa Abdul," "Musa Abdul Hir," Zulkifli Abdul Hir," "Abdul Hir bin Zulkifli," "Bin Abdul Hir Zulkifli") as a Specially Designated Global Terrorist by the Office of Foreign Assets Control. This designation, blocks "all property and interests in property" of designated terrorists and individuals who materially support terrorists. This designation under EO 13224 served to block the property and interests in property of Zulkifli Bin Abdul Hir in the U.S. or held by U.S. persons, and authorizes the U.S. to subsequently designate and block the assets of individuals and entities that are owned or controlled by, act for or on behalf of, provide support or services to, or are otherwise associated with Zulkifli Bin Abdul Hir.

9. On May 27, 2004, the Office of Foreign Assets Control, a component of the U.S. Department of Treasury, published the amended list of blocked persons pursuant to Executive Order 13224. See 69 Federal Register 30362. Zulkifli Bin Abdul Hir was designated as follows:

HIR, Musa Abdul (a/k/a "Musa Abdul;" a/k/a HIR, **Zulkifli Abdul**; a/k/a HIR, Zulkifli Bin Abdul; a/k/a **ZULKIFLI, Abdul** Hir bin; a/k/a ZULKIFLI, Bin Abdul Hir); DOB 5 Jan 1966; alt. DOB 5 Oct 1966; POB Malaysia (individual) [SDGT]

69 FR 30362-01 Page 257.

10. After September 5, 2003, the effective date of Zulkifli Bin Abdul Hir's designation, any interest in any property, direct or indirect, held by Zulkifli Bin Abdul Hir, and

1 subject to the jurisdiction of the United States, was blocked as a matter of law. Further, the
2 making or receiving of any contribution of funds, goods or services to or for the benefit of
3 Zulkifli Bin Abdul Hir was prohibited by Executive Order 13224.

4 11. Over the last approximately thirty years, the Moro Islamic Liberation Front
5 (MILF) has waged a secessionist campaign in the southern Philippines and has had sporadic
6 clashes with the Armed Forces of the Philippines. There has been a fragile cease-fire agreement
7 between the MILF and Philippine government since July 2003. According to subject matter
8 experts, since approximately 2003 sporadic violence has erupted between Muslim Mindanao's
9 pre-eminent ruling clan, the Ampatuans, and the MILF 105th Base Command, led by Ustadz
10 Wahid Tondok and Ameril Umbra, a/k/a Commander Kato. Also, some MILF factions have
11 been involved in violent and deadly clashes directed at a local politician named Datu Andal, who
12 is of the Ampatuan clan, and Andal's allies and family. Finally, on the island of Mindanao there
13 have been several violent and deadly explosions directed at civilians, some of which have been
14 attributed to the MILF.

15 12. On September 30, 2006, a ceasefire between MILF and the Philippine
16 Government ended. Following that point, hostilities flared up between MILF members and
17 government troops located in Mindanao in the southern Philippines, resulting in deadly conflicts
18 between the government forces in the Philippines and MILF members.

19 13. On October 10 and 11, 2006, a series of Improvised Explosive Devices (IEDs)
20 exploded in Tacurong and Makilala City, Province of North Cotabato, Mindanao region,
21 Philippines. The Makilala City explosion occurred at approximately 7:45 p.m. and consisted of
22 an 81mm mortar shell which went off at a Founders Day Celebration. It killed five and injured
23 twenty-nine.

24 14. On December 23, 2006, a radio-initiated IED was recovered in the vicinity of
25 Barangay Ala, Esperanza, Sultan Kudarat, Philippines. The IED was comprised of three 16mm
26 mortars. Two of the mortars did not explode. The mortar that exploded was detonated by a two-
27 way radio initiator of the brand name "Insignia."

28 ///

15. On January 10, 2007, three bombings that killed seven and wounded more than forty occurred in General Santos City, Kidapawan, and Cotabato City in Mindanao in the southern Philippines.

16. Abdul Basit Usman, a/k/a "Abdulbasit Usman," was the subject of a \$50,000 bounty offered by the United States Government for his role in the October 10 and 11, 2006 bombings in Tacurong and Makilala City, in the Philippines.

COUNT 1

Conspiracy to Provide Material Support to Terrorists

The Grand Jury realleges and incorporates by reference the General Allegations of this Indictment.

1. Beginning on a date unknown and continuing through at least August 2007, in the Northern District of California and elsewhere, the defendants

RAHMAT ABDHIR,
a/k/a Sean Kasem,
a/k/a Sean Kalimin,
a/k/a Roy Kalimin,
a/k/a Salam A. Jabar, and

ZULKIFLI ABDHIR,
a/k/a Zulkifli Bin Abdul Hir,
a/k/a Hulagu,
a/k/a Holagu,
a/k/a Lagu,
a/k/a Marwan,
a/k/a Kulon,
a/k/a Musa Abdul,
a/k/a Musa Abdul Hir,
a/k/a Zulkifli Abdul Hir,
a/k/a Zulkifli bin Hir,
a/k/a Abdul Hir bin Zulkifli,
a/k/a Abdulhir Bin Hir,
a/k/a Bin Abdul Hir Zulkifli.

did knowingly, willfully, and unlawfully combine, conspire, confederate and agree with one another, and with other individuals known and unknown to the grand jury to knowingly provide material support and resources, as that term is defined in 18 U.S.C. § 2339A(b), and to conceal and disguise the nature, location, source, and ownership of material support and resources, knowing and intending that they were to be used in preparation for, and in carrying out, a violation or violations of Title 18, United States Code, Section 956 (conspiracy to kill, kidnap,

1 maim and injure persons and to damage and destroy property in a foreign country).In violation of
2 Title 18, United States Code, Section 2339A.

3 Manner and Means

4 The manner and means by which the conspiracy was sought to be accomplished included,
5 among other things, the following during the dates of the alleged conspiracy:

6 1. Rahmat Abdhir communicated via e-mails, primarily by using the e-mail address
7 of ariman789@yahoo.com.au to send e-mails to Zulkifli Abdhir, who primarily used the e-mail
8 addresses of ikankariman@yahoo.com and dutyfree97@yahoo.com. These e-mail
9 communications between Rahmat Abdhir and Zulkifli Abdhir were usually written in the
10 Malaysian language. However in the course of e-mailing one another, the two of them refrained
11 from using their true names, and instead referred to Zulkifli Abdhir as "Hulagu," "Holagu, or
12 "Lagu."

13 2. Rahmat Abdhir and Zulkifli Abdhir communicated with one another, primarily
14 through e-mails, in which the two of them discussed items that Zulkifli Abdhir wanted Rahmat
15 Abdhir to send him in the Philippines. These items included accessories for firearms, backpacks,
16 Insignia two-way radios, knives and publications about firearms.

17 3. Rahmat Abdhir shipped the items that Zulkifli Abdhir requested from the United
18 States to Zulkifli Abdhir in the Philippines listing various aliases for the sender including "Sean
19 Kasem," "Sean Kalimin," "Roy Kalimin," and "Salam A. Jabar," and listing names other than
20 Zulkifli Abdhir's name as the recipient, instead using names such as "Muslimin Abdulmotalib,"
21 and "Norhana E. Mohamad"

22 4. Zulkifli Abdhir informed Rahmat Abdhir via e-mail, when he needed money sent
23 or wired from the United States to the Philippines so that Zulkifli Abdhir could use the money to
24 purchase various items including firearms and ammunition.

25 5. Rahmat Abdhir transferred money to Zulkifli Abdhir primarily in the amounts that
26 Zulkifli Abdhir requested, and through the bank accounts that Zulkifli Abdhir provided, using
27 names other than Zulkifli Abdhir's.

28 6. Rahmat Abdhir and Zulkifli Abdhir discussed via e-mail, the methods to use to

1 ship money and material from Rahmat Abdhir in the United States to Zulkifli Abdhir in the
2 Philippines without being detected or arousing suspicion; these methods included using false
3 names, false addresses, and various bank accounts in the Philippines and varying the times and
4 the amount of money that was sent.

5 7. Rahmat Abdhir and Zulkifli Abdhir often communicated in code to disguise the
6 nature of their activities, using terms such as "iron" to refer to firearms, "dogs" to refer to
7 government agents, and "prizes" and "presents" to refer to bombs or IEDs.

8 8. Zulkifli Abdhir kept Rahmat Abdhir informed of the situation in the Philippines
9 by providing reports of battles that were occurring in the region where Zulkifli Abdhir was
10 located between troops of the Philippine government and individuals or groups who were
11 actively protecting Zulkifli Abdhir, including, but not limited to elements of the MILF, as well as
12 by reporting on the involvement of the United States in these conflicts through the use of Orion
13 spy planes and Predator drones.

14 9. Zulkifli Abdhir kept Rahmat Abdhir informed of his own activities in the
15 Philippines, including where he was located and whom he was with.

16 10. Rahmat Abdhir and Zulkifli Abdhir kept one another informed about the situation
17 in the Philippines by forwarding each other news stories and internet links that reported details
18 about the ongoing conflict in Mindanao and elsewhere, and about the fact that Zulkifli Abdhir
19 was a wanted fugitive in the Philippines.

20 Overt Acts

21 In furtherance of the conspiracy and to effect the illegal objects thereof, the defendants
22 and their co-conspirators performed overt acts, in the Northern District of California, and
23 elsewhere, including but not limited to the following (punctuation as in the original):

24 1. On or about June 29, 2006, Zulkifli Abdhir e-mailed Rahmat Abdhir to tell him,
25 "Earlier, a commander called to inform me that the person who hosted me last year has died a
26 martyr. There has been a battle at his location for six days, and it is still not over yet. The guy
27 was young - I think he was about 45. His eldest child is 18 years old. His son-in-law is a friend of
28 mine."

1 2. On or about June 30, 2006, Rahmat Abdhir e-mailed Zulkifli Abdhir to ask, "War
2 against who? Is it far from your location?"

3 3. On or about June 30, 2006, Zulkifli Abdhir e-mailed Rahmat Abdhir and said, "It
4 is a war against the government troops. It was on the news last night; twenty government troops
5 died, as well as five MILF soldiers. A friend of mine told me that two were martyred and twenty
6 government troops died. From here, the location is about six or seven hours away on foot. The
7 fighting is still going on until now. I can hear it from my location. It started early morning from
8 six o'clock until evening. I think it has been going on for eight days now. Earlier today, a
9 helicopter was flying back and forth over in that area. You can hear it from here."

10 4. On or about July 4, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir to tell
11 him, "My friend was just telling me again that there are four martyrs now. He is in the field right
12 now. The other day, two of my friends from here (They're about 5 km. from my location), went
13 out to reinforce. They did not tell me when they were leaving. My next door neighbor told me
14 about them after they were gone. In the future, I want to go when there is need for reinforcement.
15 I can't go by myself; I must have a local guide with me. If I died as a martyr, and if there was
16 some inheritance from the sale of dad's land please don't forget about my two children
17 here...Please don't forget to transfer them into the same account that you've been using."

18 5. On or about July 14, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir with
19 the message, "the latest news" in which he provided a link to a news article dated July 13, 2006
20 that reported "the MILF continues to provide sanctuary to a core cadre of high-level JI operatives
21 - including Dulmatin, Umar Patek, Zulkifli bin Hir and possibly Abdulrahman Ayub - who have
22 continued to train members of JI and the ASG in MILF camps."

23 6. On or about July 30, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir to tell
24 him, "The commander at Hulagu's location died on Sunday, July 30th at around 4:00 p.m. He was
25 riding a motorcycle with another person and a man stopped him. After they talked a little bit,
26 three men with a garand, an M-14, and an Armalite showed up and shot them at close range.
27 There were a lot of bullets on his chest and abdomen, his intestines spilled out, and some of the
28 bullets hit his legs. He died on the spot ...they were not soldiers, but rather his own people. don't

1 know exactly the reason behind it - whether it was a grudge or politics. It looks like Hulagu
2 needs to relocate again, because there is nobody strong enough to provide protection at the
3 location. Need to use some money, because relocation requires money.”

4 7. On or about August 4, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
5 captioned “MILF commander shot dead in Maguindanao” which reported that: “Armed men
6 recently killed in ambush a field commander of the Moro Islamic Liberation Front (MILF) in
7 Pagalungan, Maguindanao. A belated military report said Abu Hashim, MILF 105th Bangsamoro
8 Islamic Armed Forces commander, was on his way to their clandestine camp in Barangay
9 Inug-ug, aboard a motorcycle last July 30 when waylaid by five ambushers along the road.
10 Hashim died on the spot due to multiple bullet wounds in the head and body. The ambushers fled
11 after the incident towards a forested section in the area, witnesses said. Local police authorities
12 theorized personal grudge as the motive behind the incident. (PNA).”

13 8. On or about August 8, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
14 which he stated that “If I had extra money, I think I would buy more iron... because the
15 occupants of the house in front of mine do not have any... There are two or three houses around
16 me that have no iron... the others do. There is one Moro M-79, but it only has one round and
17 even that had already been fired. Perhaps it did not explode. The J guy told me that there are two
18 martyrs at his battle location and more than 30 soldiers died...there was one of them whose wife
19 had also participated in the battle..”

20 9. On or about August 11, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
21 which he described the following incident, “Thursday, 1:15am, July 10th, 2006, approximately
22 ten days after the death of A. Hashim, one squad of Special Action Force (SAF) Commandos,
23 around 15 people, armed with M-4s, mini M-60, 9mm pistols, 45 caliber pistols, night vision,
24 and guided by government assets (spies) surrounded Lagu’s home with the objective of capturing
25 him (maybe to capture him alive). His house was broken into and the door got torn off. His wife
26 and child were able to get out before the exchange of fire. Three of Lagu’s neighbors with
27 Armalite rifles were able to assist until the attacking commandos withdrew. As a result, two
28 commandos died including the team leader. Two M-4 Armalite, One Taurus 9MM pistol, one .45

1 Norinco pistol, one night vision, one led diode flashlight, two M-60 belts with 200 rounds were
2 seized. It was reported on TV and in the news. Most likely there was some coordination among
3 the police, spies, and insiders (his neighbors) because the commandos knew exactly where he
4 lived, the route to his house, and the withdrawal routes."

5 10. On or about August 12, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir in
6 which he said, "Yeah, I've read it. Had Lagu not gone to bed yet at that time? Was he home or
7 not?"

8 11. On or about August 11, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
9 which said, "was asleep already, in the house. protected by Allah. The people there took all of the
10 spoils of war. Man!...the rifles were new, the latest."

11 12. On or about August 12, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir in
12 which he said, "Man. No need to buy them anymore. Just move quickly."

13 13. On or about August 12, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
14 saying "This is from the Jakarta Post" which contained an article identifying Zulkifli Abdhir,
15 describing him as "Adulhir Bin Hir, who uses the alias Marwan" as the subject of the August 10,
16 2006 raid which occurred as the SAF was attempting to serve an arrest warrant for Zulkifli
17 Abdhir but was engaged by MILF fighters in a 30-minute gunbattle.

18 14. On or about August 15, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
19 which he said, "If there is an Armalite - I would take one, but if the M-14 is available -- I would
20 take that. Let's just see whichever comes first. However, the M-14 would cost 1.2K and that does
21 not include the ammunition and the magazine. It would be 1.5K for everything, including the
22 magazine, the ammunition, and the pouch."

23 15. On or about August 21, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir to
24 tell him, "Earlier the commander here told me that the gun dealer in the city has an M203 for
25 sale. The price is 3K USD ..this 203 is only available every once in a while."

26 16. On or about August 23, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir in
27 which he said, "Man, that is good. Is it new? But let's just see if I have extra. I may be able to
28 send only two thousand in the beginning of the month, it should be enough to cover the previous

1 one.”

2 17. On or about September 1, 2006, Rahmat Abdhir wire transferred \$5,500.00 from a
3 Bank of America account in the name of Rahmat Abdhir to a MayBank Malaysia bank account in
4 the name of Minah binti Aogis Abd Aziz.

5 18. On or about September 1, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
6 with the Subject line “Re: bushmastr” in which he told him, “A little bit late, it will be deposited
7 in two to three more days.”

8 19. On or about September 1, 2006, Rahmat Abdhir sent an e-mail to Unindicted Co-
9 conspirator # 1 to tell him, “It was deposited earlier. 5.5. deposit 8k over there. The guy out there
10 has been waiting.”

11 20. On or about September 2, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
12 advising him that, “I have told Opek to deposit eight thousand.”

13 21. On or about September 6, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
14 in which he told him, “I told the Chinese guy to deposit eight thousand. He asked which account
15 you want to use for the deposit.”

16 22. On or about September 8, 2006 Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
17 in which he asked, “Could you buy me the kind of radio(s) just like the last time?.. What was the
18 brand the other day?... A Motorola, and what was the other one? The one that uses 6v or a 9v
19 batteries. Could you buy me four sets... please send two sets to Obek... please send the other two
20 sets via UPS.. I will give you a new address.”

21 23. On or about September 9, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
22 in which he asked him, “The one that has a five-mile range, eh?”

23 24. On or about September 9, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
24 to tell him, “This is the address. You send 2 sets first. To: Muslimin Abdulmotalib c/o Richard
25 M.Sabdula, Purok Pinen, Rosales Street, Cotabato City, 9600 Philippines. Do not use your real
26 name.”

27 25. On or about September 10, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
28 in which he told him, “Alright. I will send it out once I got it. I have deposited three hundred into

1 Mina's account. Next time, they will ask for the address over there. Why don't you give it later."

2 26. On or about September 17, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
3 in which he asked, "If you have time, please send the radios a little bit quicker, because the guy
4 wants to use them soon..within this fasting month.."

5 27. On or about September 21, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
6 saying, "If possible, could you send it by express so that it will get here quicker. If possible,
7 before September 30th. The ceasefire between mi and the government has broken down, but the
8 mal government has set out a deadline until September 30th."

9 28. On or about September 22, 2006, Rahmat Abdhir advised Zulkifli Abdhir in an e-
10 mail that, "If you want it fast we need to use DHL, but a real name must be used."

11 29. On or about September 26, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
12 telling him, "Sent on Saturday by USPS Express -from Roy Kalimin: two walkman. The person
13 said it would arrive in three to five days. Don't know, le.. Fedex or DHL does not allow cash
14 payments. Ha. One thousand dollars."

15 30. On or about September 30, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
16 in which he told him, "If you have some available.. please send a little bit more.. Over here
17 people are ready to go to war. The U.S. Orion spy plane has been circling the sky around the
18 areas here during these past 3 to 4 days."

19 31. On or about October 2, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
20 which he stated that, "My friend told me that the Walkman has not arrived yet..... He is skilled in
21 repairing a walkman he-he.. He said he wants to sell his Armalite to buy an M16. It probably
22 could be sold for \$900 because the M16 is so old, made in the Philippines. He asked me to help
23 out by adding five hundred. I said that if I get some blessing--God willing, I would help out. My
24 M14 has arrived earlier in the evening. It is manufactured by TRM. This one is like an M1 over
25 there. M1 only semi automatic... they don't have the automatic. But this M14 has the semi-
26 automatic and the full automatic. I test-fired the full automatic earlier.. man.. it upturned the
27 ground.. it was really powerful.. it could go through coconut trees."

28 32. On or about October 6, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in

1 which he told him, "I think the walkman will never get here.. may be ripped off by the delivery
2 man. It's rare that Customs would confiscate because that item is legal here. Could you order two
3 more sets, and then send them to Obek. Later I will tell him to send them using DHL."

4 33. On or about October 9, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
5 with the Subject line "Bangla" in which he told him, "My bngla friend had asked me to help him
6 with \$500 to purchase an M14. This is the guy who gave away prizes at Datuk Andal's. His job
7 is really to give away prizes. He said he will need a powerful iron for protection just in case the
8 dogs enter. Go check out the newspaper the day after tomorrow, the prizes he gave away."

9 34. On or about October 9, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
10 which he told him, "My three irons still need \$200 more for the magazine and the ammunition.
11 The commander asked me to get him again 600 pieces which is \$200. My bngla friend had asked
12 me to help him with \$200 because he wants to deliver some presents to D. Andal's people."

13 35. On or about October 14, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
14 which he advised that, "All the women and children here have been evacuated... preparing for
15 war... got the news from the mayor... the troops are preparing for an attack. Even the governor,
16 Datu Andal, had declared an all-out war against the MILF."

17 36. On or about October 19, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
18 enclosing a news article from the Philippine Star entitled, "Bomb suspect former PNP cook,
19 janitor" which described how an individual named Abdulbasit Usman was the principal suspect
20 in last week's bombings in Central Mindanao. The article reported that Usman had been
21 implicated in the bombing of the Fitmart department store in General Santos City in 2002 which
22 led to his arrest. During his time in prison he worked as a janitor and as a cook. He reportedly
23 escaped from prison in October 2002 and has since gone underground. The article went on to
24 report that Usman was a member of the MILF in 2002, and that he was on the military's watch
25 list after he was rumored to have been spotted with Abu Sayyaf chief Khadaffy Janjalani and JI
26 operatives Dulmatin and Umar Patek in Maguindanao in 2004. The bomb attacks which
27 occurred last week "were carried out in retaliation for the arrest in Sulu two weeks ago of
28 Dulmatin's wife and two sons" according to the police.

1 37. On or about October 19, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
2 with the Subject line "Wkmn" in which he told him, "That Bngla said that the walkmans have
3 arrived, better than the last one. They are called Insignia, eh? Where were they manufactured?
4 How much? In Manila, there is one that costs \$75, but is only 1 km. He wants more, if possible.
5 He wants to stock up. How much did it cost you to ship it that day?"

6 38. On or about October 21, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
7 which he told him, "Last night, people saw many soldiers arriving at the border. The village chief
8 said that there has been some information that the soldiers are going to attack tomorrow
9 morning.....It's almost two months now - if you have some in the beginning of the month, please
10 send it to the usual place, to Nor Mina."

11 39. On or about November 7, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
12 telling him, "It has come in, three hundred, this past Saturday. I even mailed out the Walkman
13 too. express, the same day. He said it will take five days to get there he-he. Who knows if it's
14 going to be like the last time. This time I got charged \$55 because I included the Shan spices as
15 well."

16 40. On or about November 7, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
17 asking, "Could you look around for the cheapest Insignia walkman? One that has a two-mile
18 range is okay... I think if there is a wholesale or an auction you could buy many... I think you can
19 get it cheap... go check it out on the internet... if they are cheap, if they go for \$20 per set, so it
20 would be \$200 for ten sets. My friend had asked about it, he wants to get many sets."

21 41. On or about November 9, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
22 in which he said, "We will know whether there will be a war or not by the 16th of November.
23 That would be the deadline for the Philippine government to submit the counter proposal to the
24 MILF. Commander A Wahid says that there is a soldier who wants to sell a new .50 caliber, for
25 US \$5000. He said that he can only afford 2K, and asked to find the remaining 3K hehe....The
26 government assets at Pikit are regular people, not commanders. Among the five assets the other
27 day, two of them have died. One died three days after the August 10th incident for stealing a
28 motorcycle. He was caught by the locals, and beaten to death. The other one died around 2 or 3

1 days before the Raya celebration, shot by an Armalite. The shooters were friends of Lagu's
2 neighbors...."

3 42. On or about November 16, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
4 in which he said, "I've heard that within two or three days the MILF will launch an attack
5 because the ceasefire had failed. The MILF refused to accept the government's offer, such as,
6 security and military from the government. It's the same offer that was given to the MNLF in the
7 past."

8 43. On or about November 17, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
9 in which he said, "I have moved in with my wakman Bangla friend."

10 44. On or about November 21, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
11 in which he asked, "Is he "hot" or not?"

12 45. On or about November 20, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
13 with the Subject line "Bngla" in which he said, "Bngla wkmn is 'hot'. He used to be the chef
14 inside. His group is the poorest of all, they have three Moro M-16 Armalites, five old Garands,
15 one M-14, one Mauser, one Moro M-79, and two RPG2s. This month, if you have enough, please
16 send money. I am running out."

17 46. On or about November 24, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
18 in which he said, "A day after this Bangla got a text message from his jwn his field commander
19 informed him that there is a commanding officer who sent a text message, notifying that a reward
20 is being offered for handing over Hulagu and the Bangla. don't know how the information got
21 leaked out. The network of the government asset is strong."

22 47. On or about November 25, 2006, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
23 in which he told him, "Ha. Heard from past news there was a reward for him, a fugitive on the
24 run."

25 48. On or about December 13, 2006, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
26 in which he told him, "If there is a second-hand bayonet for an M-16 available, please include
27 that too. Please also send the books and the pouch you have purchased. I think it's alright because
28 it is sold legally at gun stores here. Only shipment of complete firearms is prohibited."

1 49. On or about January 2, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir in
2 which he told him, "They have arrived, but only got the two miles range. The three-mile ones
3 were all gone at the time when I made the order."

4 50. On or about January 2, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
5 which he told him, "The two-mile is fine. Even the one-mile is okay too. How many of the two-
6 mile ones have arrived? Later, if it's available, please buy me two more sets of the Insignia and,
7 camouflage pants, size M regular, just like the other day, with a pair of green Spara canvas jungle
8 boots, size 8W (wide)."

9 51. On or about January 11, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
10 which he told him, "Why don't you check out today's news? How many sets of Walkmans have
11 you bought? When do you think you're going to send them? Do not forget the SG news."

12 52. On or about January 14, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir in
13 which he told him, "I have received five sets. I just ordered five more, including three 12-mile
14 range sets. We'll see - once they arrive at the end of this month I will send them out. Yeah, I have
15 checked out the news, those eleven are names of large 'barges'."

16 53. On or about January 16, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
17 which he told him, "The guy whose name sounds like Hulagu and is located in Sabah, was sent
18 to mnla . He called..told many stories... The focus of the FBI and the CIA is on Holagu now."

19 54. On or about January 23, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
20 which contained a link showing a photograph of a Philippine military official standing in front of
21 a large rewards for justice poster after Abu Sayyaf Group leader Abu Sulaiman had been
22 confirmed dead. Zulkifli Abdhir's photograph was also visible on the wanted poster and in his e-
23 mail, Rahmat Abdhir states, "Have you seen Hulagu's picture?"

24 55. On or about January 31, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
25 which he told him, "Go check out the news last night at abs-cbnnews.com - wakman bangla's
26 name was mentioned... you will also find it if you search on Google."

27 56. On or about February 6, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
28 which he reported, "Last week, there was a war in Midsayap, a place close to here. Ten soldiers

1 were killed and more than 20 others were badly injured. Amerul Umra of MILF said that there
2 was no deaths for martyrdom.... I haven't been sleeping at home for over a week now.. mobile..
3 guerilla.. Over here the price of a M60 machinegun is 6000 USD.. The cheapest machinegun
4 sells for 1400, and it is an old model - Browning automatic rifle.. The ammunitions though, are
5 quite expensive. It is twice the cost of the M60 ammunition, thirty Pesos each. It is like the price
6 of one and a half kilograms of rice. That Bangla requested to find one if the money is available..
7 Ideally, a squad should have a machinegun..."

8 57. On or about February 9, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir in
9 which he told him, "God willing.. I will make a deposit when I have more money later."

10 58. On or about February 9, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
11 with a news article attached which reported that a senior commander of the MILF, Adan
12 Abdullah, who was one of the few remaining foreign-trained MILF commanders, survived an
13 assassination attempt Thursday afternoon in Crossing Simuay, Sultan Kudarat, and in which
14 Rahmat Abdhir asked, "do you know who this is?"

15 59. On or about February 9, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
16 which he told him, "Adan Abdula is the base commander of division 106. He has his left foot on
17 the MILF, and his right foot on Datu Andal. When they have a battle with Amer Umra Kato from
18 division 105, his troops become Andal's dogs.. merge with Andal's troops. was shot by someone.
19 Not sure who did it, I haven't received any information. The news just now was that he died - he
20 was suffering from diabetes."

21 60. On or about February 11, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
22 in which he told him, "Last night (Saturday, the night before Sunday) hj abd tndk called at
23 around 12 o'clock to say not to sleep, the soldiers were planning to attack. At 12.30 he called
24 again.. The spy plane Orion started to hover around at 12.45.. At 1 o'clock the shooting began
25 within 1km from Hulagu's location, Bangla wakman. The soldiers were using a bazooka too,
26 105mm cannon. They were dropped within 200m-500m from Hulagu's location.. It appears to be
27 more than 10... the wind all the way in.. The guy who was right next to Lagu was struck by some
28 fragments of earth on his head.. The news this morning said that the soldiers had retreated..three

1 died... I think there were no casualties within the Mjhdn. The civilians were running and
2 dispersed disorderly.. They evacuated .. I heard the Bangla was the target.. If possible, order two
3 sets more of the Insignia (its battery power is better than the Audiovox) and ten more sets of the
4 cheap yellow ones.”

5 61. On or about February 16, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
6 in which he told him, “At 8 o’clock on Thursday night, fighting broke out at the location of Ust
7 Hj Whd Tndk.. The soldiers entered... They came in through the back way... They went in as far
8 as 500 meters from his house, 300 meters from the house where Hulagu used to live three months
9 ago... for about 30 minutes. do not know the number of the casualties yet.”

10 62. On or about February 17, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
11 in which he asked, “Was he intended to be the target?”

12 63. On or about February 17, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
13 in which he told him, “Don't know who the target was... Generally, the MILF Los Commandos,
14 Division 105 are under Akato. It looks like Hj Abdl Whd, including Bangla and Hulagu.. and
15 also the guys who just got out of jail.”

16 64. On or about February 17, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
17 in which he enclosed a news article that reported in part, “Washington has asked the Philippines’
18 largest Muslim rebel group for help in the hunt for militants from the al-Qaeda affiliated Jemaah
19 Islamiyah [JI] who are active in southern Philippines. Moro Islamic Liberation Front (MILF) vice
20 chair for political affairs, Ghadzali Jaafar, told Adnkronos International (AKI) that US deputy
21 head of mission in the Philippines, Paul Jones, personally requested help in catching JI bomb
22 experts Omar Patek and Dulmatin, dead or alive Patek and Dulmatin are allegedly
23 responsible for several bombings in the region, including the deadly 2002 Bali bombings
24 They asked also about the whereabouts of Abdul Basit Usman Usman, a suspected terrorist
25 responsible for a series of bomb attacks in the southern Philippines in recent months, has a
26 50,000 dollar bounty on his head for his arrest.”

27 65. On or about March 6, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
28 which he told him, “The latest update I heard was that 17 died as martyrs and more than 60

1 soldiers were killed. The American soldiers operated their unmanned predator spy plane which
2 has been hovering around more than four times above the Bngla's house. I am currently mobile,
3 moving from one place to another."

4 66. On or about March 7, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
5 which he told him, "Spy planes have been hovering over this area these past two days. There is a
6 big (U.S. Orion)..There is a small one that looks like an eagle (predator).. This FM Radio
7 receiver has been picking up American voices during these past two days: "*We are ready to*
8 *launch*.".. They are going to conduct a joint exercise over here for two months. Do you still have
9 the radio scanner that you used to have? How much does a set cost? The latest update is that
10 more than twenty died as martyrs, more than seventy soldiers killed, and more than a hundred
11 injured."

12 67. On or about March 21, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir
13 with the Subject line "50" in which he told him, "Last night Bangla called asking me to chip in.
14 He ordered a .50 caliber single like a Mauser from a gun maker who caters to snipers/anti
15 personnel carrier. The price for the barrel is three hundred dollars for an original one. I have seen
16 it, the barrel is new. The body and the legs, bolt, everything is made by the gun maker..
17 Everything is around four hundred dollars including the labor cost. It does not include the scope
18 which is a hundred dollars. he-he. The complete total is eight hundred dollars. If everything is
19 original, a .50 cal sniper single I heard is around 4K USD. A .50 cal automatic right now costs
20 around 5K-6K. I said okay, if I some have available I will chip in. If you have extra please send
21 some."

22 68. On or about March 27, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir in
23 which he said, "Ha, later, God willing."

24 69. On or about March 28, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir
25 with a Subject line stating "Re 50" which included a news article reporting that the United States
26 government had just offered a \$5 million reward for information leading to the capture of Zulkifli
27 Abdhir. In the article, Zulkifli Abdhir was identified by the name "Zulkifli bin Hir" and the alias
28 "Marwan." He was further identified as "a senior leader in several southeast Asian terrorist

1 groups tied to al-Qaida.” The article went on to state as follows: “Bin Hir, 40, is thought to run
2 the Kumpulun Mujahidin Malaysia organization and be a member of the central command of
3 Jemaah Islamiyah, the al-Qaida affiliate blamed for numerous attacks, including the 2002 Bali
4 nightclub bombings in Indonesia, the statement said. He is also thought to have conducted
5 explosives training for the al-Qaida-linked Abu Sayyaf Group, a militant group based in the
6 Philippines where Bin Hir is believed to have lived since August 2003, the department said. His
7 younger brother is now jailed in Indonesia for involvement in a 2001 bombing of a Jakarta mall,
8 said the statement. Bin Hir has long been sought by Philippines authorities and last August, two
9 Filipino police officers were killed in a clash while trying to approach his suspected hideout
10 about 560 miles southeast of Manila.”

11 70. On or about April 8, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
12 which he told him, “Lagu is now with the guys who just got out of that school... If you can, order
13 two sets of Insignia and four or five sets of the cheaper ones. If possible, the ones that use the
14 double A batteries, not the small triple A’s. Also three or four of the diode flashlights, one more
15 Tasco scope, size 12X25, like the one from the other day. If you can, two units because the
16 Bangla borrowed mine and has not returned it. The fighting has been going on since 6.30 this
17 morning till now, 1.30pm. I am close to the field with the 50-caliber unit. Many troops have been
18 killed.. don't know how many have become martyrs from the MI... will give you the new address
19 later for the usp.”

20 71. On or about May 11, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
21 which he told him, “The government’s assets have increased due to the budget from the white
22 people in your place. Even here, last night three persons entered the area at eleven. were shot by
23 the guards but none were hurt.. managed to escape. I do indeed need an M14 and M203. Even a
24 Moro M203 would do because an original M203 costs \$2,000. There is no Moro M14. If you
25 can, do try...”

26 72. On or about May 11, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
27 which he told him, “The 400 that is with Norm... I think will wait first until you have money, like
28 next month before buying one long one... This group has only six Armalite including mine and

1 no M14... One of my escorts died a martyr early this month, on Friday night, as a result of a
2 shoot-out with military troops in Kotabato.”

3 73. On or about June 24, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir with
4 the Subject line “Fruit” in which he asked, “Have you obtained the things yet?... Please send
5 whatever is available first because the situation is okay right now. Later, when war season comes,
6 it would be difficult to collect them. A Javanese guy who was left behind in Kotawato was killed
7 by the hypocrites. He was shot in the head two weeks ago. He was asked to come here but
8 refused. He wanted to return to his village in Jawa.”

9 74. On or about June 25, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir with
10 the Subject line “Re: Fruit” in which he told him, “Tomorrow, most likely. Will use express mail
11 like the last time. There is some chocolate, a 4 X 28 scope from China and could two .45
12 magazana be included too? May he be accepted as a martyr.. The Jw, the two names, are they
13 still healthy? On the main land? heard the Jw across whose name is Uba Dujana has gone into a
14 hotel. heard in Thailand, the government dogs are in a chaotic situation everyday as they are
15 being ambushed. ...”

16 75. On or about June 25, 2007, Rahmat Abdhir mailed a package with the United
17 States Postal Service to “Norhana E. Mohamad, CDA-ARMM, 1st Floor, Guiapal Building,
18 Poblacion 2#38 Anacleto Badoy, Cotabato City, 9600 Philippine ,” with a return address listed as
19 “Salam A. Jabar, 1020 South 12th Street, #3A, San Jose, CA 95112”. The package included:
20 one (1) US Marine Corp Technical manual for a M16 A2 rifle, two (2) Tasco 12x25 binoculars
21 with instruction manual, five (5) sets Uniden walkie talkie radios, one (1) Colt 45 8 round
22 magazine, one (1) Colt 45 10 round magazine, one (1) pair of camouflage pants 29 1/2"x32 1/2,"
23 one (1) green waterproof sack, one (1) 4x28 rifle scope, one (1) canvas drop down holster, one
24 (1) black canvas belt, four (4) silver LED flashlights and one (1) pack of 16 AAA batteries.

25 76. On or about July 3, 2007, Zulkifli Abdhir sent an e-mail to Rahmat Abdhir in
26 which he told him, “Last night I taught a course on sniping. discontinued today because the
27 troops heard and then came spy planes. The guys who were monitoring the radio could hear the
28 troops report to their commander. The commanders here attended too. They had good shots but

1 did not know how to zero in he-he. Now they know. When in war, they just shoot without aiming
 2 he-he. The fighting is within 15 meters, 25 meters or 50 meters, at the most. Actually they wait
 3 till they are at a close distance so the troops do not shoot with cannons or rockets from heli. If see
 4 a cold steel knife at a bargain and a pouch for an M16 magazine similar to a jacket without
 5 sleeves, do buy."

6 77. On or about July 6, 2007, Rahmat Abdhir sent an e-mail to Zulkifli Abdhir in
 7 which he told him, "Yes. The other day I checked on the pouch. There was only one in the ami
 8 surplus but its pockets were small. I think they cannot hold an M mgzn. Sure the gun show has
 9 it."

10 All in violation of Title 18, United States Code, Section 2339A.

11 COUNT 2

12 Provide Material Support to Terrorists

13 THE GRAND JURY FURTHER CHARGES THAT:

14 1. The Grand Jury realleges and incorporates by reference the General Allegations
 15 and the Overt Acts listed in Count One of this Indictment.

16 2. Beginning on a date unknown and continuing through at least August 2007,
 17 in the Northern District of California and elsewhere, the defendants,

18 **Rahmat Abdhir**
 19 **and Zulkifli Abdhir,**

20 did knowingly and unlawfully provide material support and resources, as that term is defined in
 21 18 U.S.C. § 2339A(b), and conceal and disguise the nature, location, source, and ownership of
 22 material support and resources, knowing and intending that they were to be used in preparation
 23 for and in carrying out a violation or violations of Title 18, United States Code, Section 956
 24 (conspiracy to kill, kidnap, maim and injure persons and to damage and destroy property in a
 25 foreign country), all in violation of Title 18, United States Code, Section 2339A.

26 ///

27 ///

28 ///

COUNT 3**Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. On or about June 10, 2006, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by sending \$500 to Zulkifli Abdhir using a bank account in the name of Normina K. Hashim in the Philippines, all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

COUNT 4**Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. On or about July 3, 2006, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or

1 Support Terrorism”), and knowingly participate in the violation of said Order, in that defendant
 2 Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction
 3 involving the contribution of goods and services for the benefit of a Specially Designated Global
 4 Terrorist, Zulkifli Bin Abdul Hir, by sending \$500 to Zulkifli Abdhir using a bank account in the
 5 name of Normina K. Hashim in the Philippines, all in violation of Title 50, United States Code,
 6 Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

7 COUNT 5

8 Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist

9 THE GRAND JURY FURTHER CHARGES THAT:

- 10 1. The Grand Jury realleges and incorporates by reference the General Allegations
 11 listed in this Indictment.
- 12 2. On or about, August 3, 2006, in the Northern District of California and elsewhere
 13 in the United States,

14 **Rahmat Abdhir,**

15 defendant herein, did willfully and knowingly violate and attempt to violate Executive Order
 16 13224 of the President of the United States dated September 23, 2001 (entitled “Blocking
 17 Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or
 18 Support Terrorism”), and knowingly participate in the violation of said Order, in that defendant
 19 Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction
 20 involving the contribution of goods and services for the benefit of a Specially Designated Global
 21 Terrorist, Zulkifli Bin Abdul Hir, by sending \$500 to Zulkifli Abdhir using a bank account in the
 22 name of Normina K. Hashim in the Philippines, all in violation of Title 50, United States Code,
 23 Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

24 COUNT 6

25 Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist

26 THE GRAND JURY FURTHER CHARGES THAT:

- 27 1. The Grand Jury realleges and incorporates by reference the General Allegations
 28 listed in this Indictment.

2. On or about September 1, 2006, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by wire transferring \$5,500.00 for Zulkifli Abdhir from a Bank of America account in the name of Rahmat Abdhir to a MayBank Malaysia, bank account in the name of Minah binti Aogis Abd Aziz, all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

COUNT 7

Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. On or about September 9, 2006, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by wire transferring \$300 for Zulkifli Abdhir through a bank

account in the Philippines in the name of Normina K Hashim, all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

COUNT 8

Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. On or about September 23, 2006, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by sending an Express Mail Package containing two hand held radios to Zulkifli Abdhir which listed the sender's name as Roy Kalimin, and the recipient's name and address as Muslimin Abdulmotalib C/O Richard M. Sabdulla, Purok Pinen, Rosales Street, Cotabato City 9600 Philippine, all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

COUNT 9

Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

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2. On or about, October 12, 2006, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by sending \$2,100 to Zulkifli Abdhir through a wire transfer to the Philippines using an account in the name of Mineh Dingigogiss Abdaziz, all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

COUNT 10

Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. On or about, November 4, 2006, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by sending two hand held radios to Zulkifli Abdhir in the

Philippines using the name and address of Muslimin Abdulmotalib C/O Richard M. Sabdulla, Purok Pinen, Rosales Street, Cotabato City 9600 Philippine and a sender's name of Sean Kalimin, all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

COUNT 11

Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. On or about, November 4, 2006, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by sending \$300 to Zulkifli Abdhir using a bank account in the name of Normina K. Hashim in the Philippines, all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

COUNT 12

Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. On or about December 1, 2006, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by sending \$300 to Zulkifli Abdhir in the Philippines using a Philippine National Bank Account in the name of Normina K. Hashim, all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

COUNT 13**Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.
2. On or about January 6, 2007, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by sending \$300 to Zulkifli Abdhir in the Philippines using a Philippine National Bank Account in the name of Normina K. Hashim, all in violation of Title

50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

COUNT 14

Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. On or about January 20, 2007, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by mailing a package containing one (1) camouflage long-sleeve, button-down shirt; one (1) camouflage jacket; fourteen (14) yellow and black Uniden GMRS 2-way radios; six (6) black Audiovox GMRS 12-mile range 2-way radios; two (2) Brinkmann flashlights; six (6) packets of miscellaneous spices to Zulkifli Abdhir in the Philippines using the name and address of "Muslimin Abdulmotalib c/o Richard M. Sabdulla, Purok Pinen, Rosales Street Cotabato City 9600 Phillippines," with a return address listed as "Sean Kasem, 1020 South 12th Street #230, San Jose, CA 95112 (408)947-1828," all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

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COUNT 15**Contributing Goods or Services for the Benefit of a Specially Designated Global Terrorist**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. On or about June 25, 2007, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did willfully and knowingly violate and attempt to violate Executive Order 13224 of the President of the United States dated September 23, 2001 (entitled "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism"), and knowingly participate in the violation of said Order, in that defendant Rahmat Abdhir, being a United States person, attempted to and did engage in a transaction involving the contribution of goods and services for the benefit of a Specially Designated Global Terrorist, Zulkifli Bin Abdul Hir, by sending a package which included : one (1) US Marine Corp Technical manual for an M16 A2 rifle, two (2) Tasco 12x25 binoculars with instruction manual, five (5) sets Uniden walkie talkie radios, one (1) Colt 45 8 round magazine, one (1) Colt 45 10 round magazine, one (1) pair of camouflage pants 29 1/2"x32 1/2", one (1) green waterproof sack, one (1) 4x28 rifle scope, one (1) canvas drop down holster, one (1) black canvas belt, four (4) silver LED flashlights and one (1) pack of 16 AAA batteries, through the United States Postal Service to Zulkifli Abdhir in the Philippines using the name and address of "Norhana E. Mohamad, CDA-ARMM, 1st Floor, Guiapal Building, Poblacion 2#38 Anacleto Badoy, Cotabato City, 9600 Philippine ," with a return address listed as "Salam A. Jabar, 1020 South 12st Street, #3A, San Jose, CA 95112," all in violation of Title 50, United States Code, Section 1705(b), Executive Order 13224, and Title 18, United States Code, Section 2.

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COUNT 16**False Statements**

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about June 25, 2007, in the Northern District of California and elsewhere in the United States,

Rahmat Abdhir,

defendant herein, did knowingly and willfully make material false statements and representations, and conceal material facts by a trick, scheme or device, in a matter within the jurisdiction of the executive branch of the Government of the United States as follows:

2. Rahmat Abdhir attempted to ship a package through the United States Postal Service to an individual in the Philippines identified as "Norhana E. Mohamad," however rather than listing his true name as the sender's name on the Customs Declaration, he listed the name of "Salam A. Jabar," and rather than listing his true address, he listed a return address of "1020 South 12th Street, #3A, San Jose, CA 95112."

3. Rahmat Abdhir attempted to ship a package through the United States Postal Service to an individual in the Philippines identified as "Norhana E. Mohamad" which contained the following items:

- 1 brown t-shirt
- 2 bags of bite size snickers candy
- 1 bag of Hershey chocolate
- 1 US Marine Corp Technical manual for a —16 A2 rifle
- 4 pack of gray t-shirts size medium
- 2 Tasco 12x25 binoculars with instruction manual
- 5 sets Uniden walkie talkie radios
- 1 Colt 45 8 round magazine
- 1 Colt 45 10 round magazine
- 5 Fruit of the Loom Briefs
- 1 navy blue Nike windbreaker pants
- 1 pair of camouflage pants 29 1/2"x32 1/2"
- 1 green waterproof sack
- 1 4x28 rifle scope
- 1 canvas drop down holster
- 1 black canvas belt
- 4 silver LED flashlights
- 1 pack of 16 AAA batteries

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1 However on the Customs Declaration, Rahmat Abdhir listed only the following items:

2 Walkman, Quantity 5, Value \$50
3 T-Shirt, Quantity 1, Value \$10
4 Pants, Quantity 2, Value \$25
Flashlight, Quantity 4, Value \$20
Chocolate pack, Quantity 3, Value \$15

5 In violation of Title 18, United States Code, Section 1001(a).


7 DATED: 8/1/07

A TRUE BILL.

9 

10 SCOTT N. SCHOOLS
11 United States Attorney

8 
FOREPERSON

13 (Approved as to form: )

14 DOJ Trial Attorney J. Gibbs

28
INDICTMENT

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

SEE ATTACHMENT TO PENALTY SHEET

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY:

SEE ATTACHMENT TO PENALTY SHEET

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

S/A Russell MacTough-FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

SHOW DOCKET NO.

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person
Furnishing Information on
THIS FORM

SCOTT N. SCHOOLS

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y
(if assigned)

JOHN T. GIBBS

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

RAHMAT ABDHIR

DISTRICT COURT NUMBER

07 00501 Jr

DEFENDANT

IS NOT IN CUSTODY

1) ☒ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

6) ☐ Awaiting trial on other charges

☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer
been filed?

☐ Yes
☐ No

If "Yes"
give date
filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED
TO U.S. CUSTODY

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☐ NO PROCESS*

☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

UNITED STATES OF AMERICA,

v.

RAHMAT ABDHIR, and
ZULKIFLI ABDHIR.

ATTACHMENT TO PENALTY SHEET

Counts One and Two: Title 18, United States Code, Section 2339A – Conspiracy to Provide/Providing Material Support to Terrorists

15 years imprisonment (maximum)

\$250,000 fine

3 years of supervised release

\$100 special assessment

Counts Three through Fifteen: Title 50, United States Code, Section 1705 – Contributing Goods and Services to a Specially Designated Global Terrorist

20 years imprisonment (maximum)

\$50,000 fine

3 years of supervised release

\$100 special assessment

Count Sixteen: Title 18, United States Code, Section 1001 – Material False Statements

8 years imprisonment (maximum if the offense involves international or domestic terrorism)

\$250,000 fine

3 years of supervised release

\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

SEE ATTACHMENT TO PENALTY SHEET

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY:

SEE ATTACHMENT TO PENALTY SHEET

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

S/A Russell MacTough-FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW
DOCKET NO.

MAGISTRATE
CASE NO.

Name and Office of Person
Furnishing Information on
THIS FORM

SCOTT N. SCHOOLS

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y
(if assigned)

JOHN T. GIBBS

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

ZULKIFLI ABDHIR

DISTRICT COURT NUMBER

CR 07 00501 RS JF

DEFENDANT

IS NOT IN CUSTODY

1) ☒ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

6) ☐ Awaiting trial on other charges

☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED
TO U.S. CUSTODY

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☐ NO PROCESS*

☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments:

UNITED STATES OF AMERICA,

v.

RAHMAT ABDHIR, and
ZULKIFLI ABDHIR.

ATTACHMENT TO PENALTY SHEET

Counts One and Two: Title 18, United States Code, Section 2339A – Conspiracy to Provide/Providing Material Support to Terrorists

15 years imprisonment (maximum)

\$250,000 fine

3 years of supervised release

\$100 special assessment

Counts Three through Fifteen: Title 50, United States Code, Section 1705 – Contributing Goods and Services to a Specially Designated Global Terrorist

20 years imprisonment (maximum)

\$50,000 fine

3 years of supervised release

\$100 special assessment

Count Sixteen: Title 18, United States Code, Section 1001 – Material False Statements

8 years imprisonment (maximum if the offense involves international or domestic terrorism)

\$250,000 fine

3 years of supervised release

\$100 special assessment